



Lead and Copper Rule Short-Term Revisions

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Public Water Supply Section


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Lead and Copper Rule (LCR) Short-Term Revisions (STR)

- Overview of the LCR STR
- Monitoring Revisions
- Advanced Notification of Treatment and Source Changes
- Public Education
- Re-evaluation of Tested Out Lead Service Lines



Scope of the LCR STR

- Short-term revisions designed to address implementation issues with existing regulation
- Long-term revisions process likely to start soon
- Key elements of treatment technique will remain the same
- LCR Quick Reference Guide

**[http://www.epa.gov/safewater/lcrmr/pdfs/
draft/qrg_lcrmr_quickguide2007.pdf](http://www.epa.gov/safewater/lcrmr/pdfs/draft/qrg_lcrmr_quickguide2007.pdf)**



Final Revisions to LCR

(Federal Register, October 10, 2007 p. 57782)

<http://www.epa.gov/fedrgstr/EPA-WATER/2007/October/Day-10/w19432.pdf>

- Published in the Federal Register October 10, 2007.
- Effective December 10, 2007.
- Montana has yet to adopt the LCR STR, could happen in September 2008.
- The LCR is adopted in ARM 17.38.200



Monitoring Revisions LCR STR

Minimum number of samples required

- <5 samples for small systems (<100 people) with < 5 taps
- 90th Percentile lead and copper values would now be equal to the highest value and compared against the action levels.



Monitoring Revisions LCR STR

Definition of Compliance and Monitoring Periods

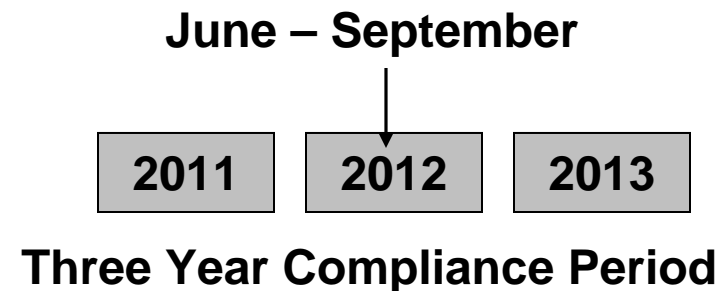
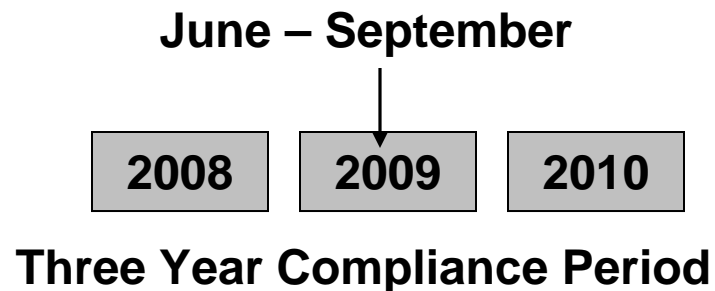
- Modify the definitions for monitoring period and compliance period
 - Timing of actions after a system exceeds an action level
 - Reduced monitoring periods end on September 30 (June – September) whereas the compliance period ends on December 31.
- Rule revision – clarifies that systems are deemed to be exceeding the AL on the date which the monitoring period has ended (i.e. September 30)



Monitoring Revisions LCR STR

Three Year Compliance Cycle for Systems on Triennial Monitoring

- Four month period every three years (June – September)
- Systems on triennial monitoring cannot spread sampling out over a three-year period
- System can not exceed 3 years between sampling events





Notice of Lead Monitoring Results to Occupants LCR STR

- Systems must provide notification of lead in drinking water results to occupants within 30 days.
- Content:
 - Results of lead in tap water
 - Health effects of lead
 - Actions to reduce lead exposure
 - Utility contact
 - MCLG
 - Action Levels



Notice of Lead Monitoring Results to Occupants LCR STR

- Delivery Mechanisms

- Mail or Hand Delivery

- NTNCWS

- Upon approval from the State, can post in prominent locations in the facility

- Reporting requirements

- 3 months from the end of the monitoring period
 - System must submit a copy to the State
 - System must certify that notification requirement have been met



CCR Revisions LCR STR

- CCR must include a statement about lead in drinking water and the health effects on children.
- Required language includes a flushing recommendation of 30 seconds to 2 minutes.
- Required language includes information on the sources of lead in drinking water and places to find more information on testing for lead.
- System can write its own educational statement in consultation with the state.
- Required CCR Language is found in 40 CFR 141.154



Notification and Approval for Long-term Treatment Changes LCR STR

- Require systems to notify the State and obtain approval prior to implementing a long term change in water treatment.
- Notification must occur as early as possible prior to the treatment change.
- Examples include, new treatment process, modification of an existing treatment process, changes to chemicals that could affect pH or inhibitor concentration.
- State could then require systems to complete baseline lead and copper monitoring.



Notification and Approval for Addition of New Sources LCR STR

- Require systems to notify the State and obtain approval prior to adding a new source of water.
- Could the new source cause a corrosion problem?
- State could then require systems to complete baseline lead and copper monitoring.



Public Education Delivery

Revisions

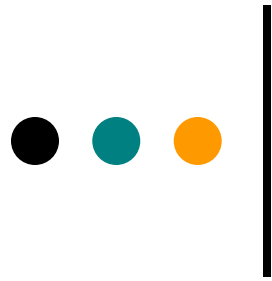
LCR STR

- Public education will be due within 60 days from the end of the monitoring period if there is a lead action level exceedence.
- Deliver materials to additional organizations frequented by pregnant women and children.
- Contact the local health agency via phone or in-person.
- Coordinate with other public health agencies to provide lead public education.
- Notice on every bill until back under the action level.



Re-Evaluation of Tested-Out Lead Service Lines LCR STR

- Only affects systems that used the tested-out procedure for lead service lines.
- Lead service lines that tested out below 15 ppb would not be considered permanently replaced and would have to be re-evaluated if a system later re-exceeds the action level.
- Re-evaluation could consist of either testing the line or physical replacement of the line.



Lead Service Line Replacement LCR STR

- Schedule is more explicit
- First year
 - Requires 7% replacement
 - Begins immediately at end of monitoring
- Recordkeeping will be key
- Potential budget impact of large number of “tested out” services.
- Still have all existing testing and notification requirements
- Research indicates full replacement is best



Lead and Copper Rule (LCR) Short-Term Revisions (STR)

- Review of the LCR STR
- Monitoring Revisions
- Advanced Notification of Treatment and Source Changes
- Public Education
- Re-evaluation of Tested Out Lead Service Lines



Questions?!?!?

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